



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

**STATEMENT OF KIRAN A. AHUJA
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BEFORE THE

**Select Committee on Intelligence
United States Senate**

HEARING ON

“Federal Personnel Vetting Reform”

March 29, 2023

Chairman Warner, Vice Chairman Rubio, and Members of the Committee, thank you for the opportunity to testify today on federal vetting reform and the critical work of federal employees. The federal government’s most important asset is its people and, as the strategic human capital leader for federal agencies, the Office of Personnel Management (OPM) is committed to helping federal agencies aggressively seek out new talent. From attracting early-career talent who are just starting their careers, to mid-career experts who want to serve the American people, and welcoming back former federal employees, OPM has been focused on helping agencies rebuild the federal workforce while making sure that we are drawing from a diversity of backgrounds, perspectives, and viewpoints.

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Of course, it is not enough to just attract talent. We must employ processes that both sufficiently vet future employees and onboard them in a timely and efficient manner. This is a priority for the Administration, which has made vetting reform a priority in the President's Management Agenda.

At OPM, we are committed to doing just that, working alongside our partners on the Suitability, Security, and Credentialing Performance Accountability Council (PAC) on these shared goals. I am pleased that these PAC partners—my colleagues from the Office of Management and Budget (OMB), the Office of the Director of National Intelligence (ODNI), and the Department of Defense (DOD)—have joined me here today. They all have been critical partners as members of the PAC as we work to ensure that our nation has the trusted federal workforce it needs.

There are three main topics I want to cover today:

- OPM's role within the PAC and the importance of suitability and vetting;
- The progress OPM and PAC partners have made in implementing the PAC's Trusted Workforce 2.0 initiative, including reducing time to onboard new hires, expanding continuous vetting, enhancing mobility, and improving the vetting experience; and
- Our next steps as we work with agency partners to improve personnel vetting.

OPM's Role as Executive Agent and Importance of Suitability / Credentialing

OPM is the Suitability and Credentialing Executive Agent for the Executive Branch. This means that we establish policy for suitability and credentialing standards and delegate decision-making to the heads of agencies about their applicants and employees. Together with the Director of

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National Intelligence, Avril Haines, who serves as the Security Executive Agent for policy and oversight of the federal government's vetting process for eligibility to access classified information or to hold sensitive positions, we are responsible for policy and oversight of the federal government's personnel vetting process. We work closely with our PAC partners to promote consistent application of these processes across the Executive Branch.

Regardless of the type or level of a federal government position, it is imperative that individual employment decisions do not create an unacceptable risk to safety or the agency's mission. This requires agencies to determine if individuals can be entrusted to perform certain work. OPM provides the standards that agencies use to make the suitability determination as to whether a person's character or conduct will have a negative impact on the integrity or efficiency of the agency or disqualifies a potential employee.

Agencies must also decide whether to issue a Personal Identity Verification (PIV) credential to an employee or contractor, permitting access to federal facilities and information systems. To assist agencies with these decisions, OPM provides the standards that agencies use to make the credentialing determination as to whether issuing a PIV credential would pose an unacceptable risk to people, property, or information systems.

A background investigation is used to inform suitability and credentialing decisions and for decisions of eligibility for access to classified information or to hold a national security sensitive position, when appropriate. As the Executive Agents for personnel vetting, Director Haines and I establish the investigative standards that dictate the checks to be performed for suitability,

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credentialing, national security, and the cycle for follow-ups. We have also aligned the investigations for suitability, fitness, credentialing, and security so that one investigation may serve all three purposes – determining suitability or fitness to work for or on behalf of the federal government, determining PIV credentialing, and deciding eligibility for access to classified information or to serve in a sensitive position.

As we work to implement the President’s Management Agenda on Suitability and Credentialing, OPM and our partners are united in our efforts to transform personnel vetting to better identify risks, support mission areas, and improve workforce mobility.

Trusted Workforce 2.0

Historically, agencies have experienced delays in the process of clearing individuals to begin work. Only a few years ago, the background investigations inventory exceeded 725,000 and the investigative process exceeded a year on average for individuals seeking to occupy critical sensitive positions, slowing agencies’ ability to execute on mission in a timely manner. Delays in processing reinvestigations also inhibited the ability of individuals to change positions within and across agencies.

Through our and our PAC partners’ efforts, the inventory improved and returned to a steady state with a reduction in the time to clear individuals. But more change was needed. The vetting system remained vulnerable to disruptions that could aggravate inventory management and vetting timelines. These challenges affected not only the onboarding and mobility of federal employees but also contractors who support agency missions.

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To meet these challenges, the Executive Agents and our PAC partners have established the Trusted Workforce 2.0 (TW 2.0) initiative, which is transforming how the federal government evaluates individuals for a trusted workforce. The initial phase of this initiative successfully drew down the investigative inventory to a steady state. A critical piece to complete the TW 2.0 vision is modernizing the federal government’s approach to personnel vetting investigations. It is critical to find solutions that are minimally susceptible to delays while also promoting and prioritizing the continued integrity of the workforce.

The old system was designed decades ago and built on a largely manual framework for collecting and processing data. Today – driven by significant changes to agency missions, societal norms, the threat landscape, and key technological advances and efficiencies – we have established, and agencies are implementing, a more efficient system that both meets agency needs for information gathering and provides transformational reform.

TW 2.0 Guidelines and Standards

The foundation of TW 2.0 is the Federal Personnel Vetting Core Doctrine, which outlines the elements and intended outcomes of successful personnel vetting and policy. The doctrine underscores shared responsibility to establish and maintain a culture of trust across the federal workforce.

TW 2.0 is supported by a comprehensive suite of guidelines describing the outcomes of successful implementation and standards for how to achieve those outcomes. Last year, to guide the development of standards for the various personnel vetting elements, the Executive Agents issued three sets of guidelines.

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First, Federal Personnel Vetting Guidelines provide a risk management approach for personnel vetting, guiding our subsequent issuance of investigative standards and Common Principles in Applying Federal Personnel Vetting Adjudicative Standards, which assists agencies by highlighting and aligning commonalities in adjudication across security, suitability, and credentialing adjudications.

Second, Personnel Vetting Engagement Guidelines set out the outcomes we wish to achieve in interactions between personnel vetting practitioners and individuals going through the vetting process.

Third, Federal Personnel Vetting Performance Management Guidelines describe the outcomes we seek to achieve in establishing performance metrics for personnel vetting.

In addition to and consistent with these guidelines, OPM and ODNI have also issued two key standards documents.

First, in May 2022, we issued Federal Personnel Vetting Investigative Standards for agencies, which was one of the key milestones in the process.

Second, we issued Federal Personnel Performance Management Standards in September 2022. These standards establish key performance measures to assess the success of personnel vetting programs through robust performance management that measures efficiency, effectiveness, fairness, and risk across the federal personnel vetting enterprise.

The TW 2.0 standards seek to improve the vetting process in several areas, including reducing time to onboard new hires, establishing continuous vetting for managing risk, shifting to a three-tiered model for investigations, and improving the vetting experience. Each of these

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efforts is discussed in more detail below.

Reducing Time to Onboard New Hires

Under the new TW 2.0 investigative standards, initial vetting for new hires provides agencies with the opportunity to bring individuals on board more quickly. The standards employ a risk-managed approach that leverages modern technological capabilities to provide agencies with relevant information in near real time.

This approach provides a specified set of automated record checks that are accomplished expeditiously and allow agencies to make a preliminary determination if an individual may enter on duty in advance of full completion of the required investigative tier.

For national security-sensitive positions, agencies may make a preliminary determination upon completion of these checks to approve the individual for temporary eligibility for access to classified information or to occupy a sensitive position.

While similar to policies for temporary clearance decisions under the prior model, the TW 2.0 approach provides a significant advantage to agencies to assist in managing risk—specifically, starting enrollment in continuous vetting checks following the temporary clearance determination rather than waiting until after the completion of the background investigation. This gives agencies an additional tool for managing risk and affords them the opportunity to more quickly address any concerning information that surfaces.

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Continuous Vetting for Managing Risk

The new TW 2.0 investigative standards also establish continuous vetting to assess risk in near real-time by providing insight into whether an individual's conduct may present a risk to the national security or to the efficiency of the service. Early detection of potential concerns provides the opportunity to offer individuals support, if warranted, before a potential problem escalates. Continuous vetting supports workforce mobility by keeping an individual's investigation status current and reducing any investigative work needed for upgrades, transferring trust, or reestablishing trust.

Three-tiered Model for Investigations Improves the Mobility of the Workforce

The TW 2.0 investigative standards also streamline the background investigation framework, shifting away from the former five-tiered model and instead establishing a three-tiered structure.

- The Low Tier provides the investigative requirements for positions that are designated as low risk with no national security sensitivity. This is the minimum tier for investigating any individual with long-term access to federal facilities or information systems.

- The Moderate Tier provides the investigative requirements for positions that are designated as having the potential to introduce moderate risk to the efficiency or integrity of the service, which includes any non-critical sensitive position and any position that requires eligibility for access to Secret information.

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- The High Tier establishes the investigative requirements for positions that are designated as having the potential to introduce a high risk, including any critical or special sensitive position and any position that requires eligibility for access to Top Secret information or Sensitive Compartmented Information.

This three-tiered model provides three primary workforce mobility benefits over the former five-tiered model.

First, under the TW 2.0 three-tiered model, the basic investigative requirements within each of the tiers are the same regardless of the type of trust determination, and this provides the basis for improved investigative reciprocity, or transfer of trust. For example, the investigative requirements for a moderate tier investigation are the same for all moderate risk positions. This is an improvement over the former model where two different tiers existed for moderate risk positions, depending on whether those positions were sensitive or non-sensitive.

The practical repercussions of the prior model were that individuals serving in non-sensitive moderate risk positions would need a new investigation to move into a sensitive moderate risk position (from a Tier 2 to a Tier 3) position.

Under the TW 2.0 model, there is only one moderate risk tier with one set of investigative requirements; thus, a new investigation would not be required. The streamlined model will result in greater mobility without introducing increased risk when an individual moves from agency to

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agency or position to position within an agency.

Second, the TW 2.0 investigative three-tiered model does not require individuals to “start from scratch” by undergoing new investigations when moving upward in position risk level, as was required under the prior model.

Rather than starting a new initial investigation, the investigating agency will obtain the necessary investigative elements to close the gap between the lower and higher tiers. For instance, in the event an individual is moving from the Moderate Tier to a High Tier, the investigating agency will only obtain information pertaining to the High Tier that was not otherwise collected in the Moderate Tier. This TW 2.0 “upgrade” scenario will satisfy investigative requirements more quickly, again with the intended outcome of greater mobility.

Third, the three-tiered model results in a more streamlined process for individuals seeking to reestablish their trusted status when returning to a vetted position after a break in service. We have also expanded the length of time that may occur without requiring a new investigation following a break in service.

Under the new model, the “reestablishment of trust” scenario reduces the investigative work required when an individual returns to work for, or on behalf of, the federal government, depending on the length of absence and enrollment in continuous vetting.

Improving the Vetting Experience

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In addition to the many benefits of the TW 2.0's transformative approach to personnel vetting investigations, I also want to highlight the important work OPM and our PAC partners are doing to improve the vetting experience for individuals undergoing these processes.

As I mentioned previously, Director Haines and I issued Personnel Vetting Engagement Guidelines that require all parties involved in administering personnel vetting to proactively communicate expectations and guidance to individuals as they progress through the personnel vetting process. This provides applicants a greater understanding of the process they are undergoing and the rationale for various requirements. For example, we are proposing to use more plain language and provide more explanations in the investigative questionnaires used for personnel vetting.

This approach also aligns with and supports the federal government's broader efforts to recruit and retain a diverse and talented workforce as we work with our partners on assessing the impact of current vetting requirements on barriers to underrepresented groups.

Next Steps

Our work to date has established the major components of the policy framework for TW 2.0, including standards for investigations and adjudications. Our next steps are to complete our issuance of that framework and ensure full implementation of these policies as quickly as feasible.

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We will complete the policy framework with two key issuances over the next two quarters. We will complete our work to align the National Training Standards for background investigators and adjudicators to the Trusted Workforce polices. And we will establish Vetting Management Standards for the various other processes carried out by agency practitioners in support of personnel vetting.

The ongoing implementation of our Trusted Workforce efforts will continue to be a priority as we focus on delivering results quickly. Together with our PAC partners and Senior Implementation Officials across agencies, we will ensure that the federal government executes on the PAC Implementation Strategy that we issued in April of last year to assist agencies in preparing for and executing the new model for personnel vetting. This includes transitioning from periodic reinvestigations to continuous vetting for the non-sensitive public trust population. It also includes establishing targets and defined timeframes for the suite of metrics in the Performance Management Standards. And we will provide transparency by continuing to report our progress in achieving key milestones on [performance.gov](https://www.performance.gov).

Key to the implementation strategy is the work being done by our DOD partners to establish and deploy the National Background Investigations Services (NBIS), which will replace the legacy systems used for personnel vetting processes. The goal of separating DOD's users and network traffic from the OPM network by the end of 2023 has been agreed on by both DCSA and OPM leadership. Together, OPM and DOD have developed a future state architecture for an environment that will support the legacy background investigation systems until they can be decommissioned. The migration of personnel vetting management from the difficult-to-change

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legacy systems to the more advanced and agile NBIS will provide technological capabilities necessary to fully realize the TW 2.0 model.

Together with ODNI, DOD, and OMB, OPM has made tremendous progress. Improvements made under TW 2.0 will enable us to reduce the time required to onboard new hires, improve workforce mobility, and enhance risk management by identifying concerning behavior sooner. It will also improve the experience for individuals undergoing the vetting process. We will continue to work closely with our PAC partners and this Committee as we fully realize the promise of TW 2.0.

In conclusion, I want to again thank Chairman Warner, Vice Chairman Rubio, and all the Members of the Senate Select Committee on Intelligence for holding this important hearing.

I am proud of what the Administration and the Suitability, Security, and Credentialing Performance Accountability Council has accomplished over the past year, and I am excited about the opportunities to accomplish even more over the next year.

I also look forward to working with my colleagues on this panel and Members of this Committee on the critical topics I discussed today. I hope today's discussion showcases OPM's dedication to these efforts.

I look forward to answering any questions you may have.